

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**In re:**  
**KRISJENN RANCH, LLC**  
*Debtor*

~~~~~

**Chapter 11**

**Case No. 20-50805**

**KRISJENN RANCH, LLC and  
KRISJENN RANCH, LLC-SERIES  
UVALDE RANCH, and KRISJENN  
RANCH, LLC-SERIES PIPELINE  
ROW as successors in interest to  
BLACKDUCK PROPERTIES, LLC,  
*Plaintiffs***

~~~~~

**V.**

**DMA PROPERTIES, INC., and  
LONGBRANCH ENERGY, LP,  
Defendants**

**Adversary No. 20-05027**

**DMA PROPERTIES, INC**  
***Cross-Plaintiff/Third Party Plaintiff***

~~~~~

**v.**

**KRISJENN RANCH, LLC,  
KRISJENN RANCH, LLC-SERIES  
UVALDE RANCH, and KRISJENN  
RANCH, LLC-SERIES PIPELINE ROW,  
BLACK DUCK PROPERTIES, LLC,  
LARRY WRIGHT, and JOHN TERRILL  
*Cross-Defendants/Third-Party  
Defendants***

**Adversary No. 20-05027**

## NOTICE OF FILING OF PRIVILEGE LOG

TO THE HONORABLE CHIEF BANKRUPTCY JUDGE RONALD B. KING:

Pursuant to the previous written order of this Honorable Court (Docket #42), David Strolle ("Deponent"), hereby files the attached Privilege Log identifying privileged communications and the privilege or privileges that Deponent believes are applicable to each listed communication. In the event that this Honorable Court determines that some or all of the documents identified in the Privilege Log should be subject to an "in camera" inspection, Deponent will make the underlying communications available to the Court for review.

WHEREFORE, Deponent, David Strolle, respectfully requests that the Court uphold the privileges asserted in the attached Privilege Log and for such other relief as is just under the circumstances.

Dated: September 14, 2020

Respectfully submitted,

By: /s/ David Strolle  
David P. Strolle, Jr.  
State Bar No. 19408700  
[dstrolle@caglaw.net](mailto:dstrolle@caglaw.net)  
GRANSTAFF, GAEDKE &  
EDGMON, P.C.  
5535 Fredericksburg Road, Suite 110  
San Antonio, TX 78229  
Telephone: 210-348-6600  
Facsimile: 210-366-0892

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served on all counsel of record by way of e-service through the CM/ECF system by notice of electronic filing or via email on the 14th day of September 2020:

Michael Black  
BURNS & BLACK PLLC  
750 Rittiman Road  
San Antonio, Texas 78209  
210-829-2022  
210-829-2021 fax  
mblack@burnsandblack.com  
Attorneys for Longbranch Energy, LP and  
DMA Properties, Inc.

Christopher S. Johns  
Christen Mason Hebert  
JOHNS & COUNSEL PLLC  
14101 Highway 290 West, Suite 400A  
Austin, Texas 78737  
512-399-3150  
512-572-8005 fax  
cjohns@johnsandcounsel.com  
chebert@johnsandcounsel.com

Timothy Cleveland  
CLEVELAND | TERRAZAS PLLC  
4611 Bee Cave Road, Suite 306B  
Austin, Texas 78746  
512-689-8698  
tcleveland@clevelandterrazas.com

Natalie Wilson  
LANGLEY & BANACK, INC.  
745 East Mulberry Avenue | Suite 700  
San Antonio, TX 78212  
210-736-6600  
lwilson@langleybanack.com  
Attorneys for DMA Properties, Inc.

Jeffery Duke  
DUKE BANISTER MILLER & MILLER  
22310 Grand Corner Drive, Suite 110  
Katy, Texas 77494  
[jduke@dbmmlaw.com](mailto:jduke@dbmmlaw.com)  
Counsel for Longbranch Energy, LP

OFFICE OF THE UNITED STATES TRUSTEE  
903 San Jacinto Blvd, Room 230  
Austin, Texas 78701  
[shane.p.tobin@usdoj.gov](mailto:shane.p.tobin@usdoj.gov)  
United States Trustee

Ezekiel J. Perez  
State Bar No. 24096782  
111 W. Sunset Rd.  
San Antonio, TX 78209  
Telephone: 210-664-5000  
Facsimile: 210-598-7357  
[zeke@muller-smeberg.com](mailto:zeke@muller-smeberg.com)

## Privilege Log

|    | Document Name/Bates Range | Document Type | Document Date | Author         | Recipient                                                                                     | Persons With Access                                                               | Subject Matter                                                          | Privilege Asserted                                                                              |
|----|---------------------------|---------------|---------------|----------------|-----------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|
| 1  | LW336                     | email         | 6/26/19       | David Strolle  | Craig Crockett,<br>Larry Wright,<br>Derick<br>Rodgers,<br>Ricardo<br>Cedillo, Tracy<br>George | Craig Crockett, Larry Wright,<br>Derick Rodgers, Ricardo Cedillo,<br>Tracy George | Communication regarding filed<br>lien release                           | Workproduct made in anticipation of<br>litigation                                               |
| 2  | LW337                     | email         | 6/11/19       | David Strolle  | Tracy George                                                                                  | David Strolle, Tracy George                                                       | Communication regarding<br>correspondence about impending<br>litigation | Workproduct made in anticipation of<br>litigation                                               |
| 3  | LW338                     | email         | 6/11/19       | David Strolle  | Tracy George                                                                                  | David Strolle, Tracy George                                                       | Communication regarding<br>correspondence about impending<br>litigation | Workproduct made in anticipation of<br>litigation                                               |
| 4  | LW339-40                  | email         | 6/11/19       | David Strolle  | Tracy George                                                                                  | David Strolle, Tracy George                                                       | Communication regarding<br>correspondence about impending<br>litigation | Workproduct made in anticipation of<br>litigation                                               |
| 5  | LW341                     | email         | 12/26/19      | David Strolle  | William<br>Kuhlmann,<br>Larry Wright                                                          | David Strolle, Tracy George,<br>William Kuhlmann, Larry Wright                    | Correspondence concerning<br>negotiations with William<br>Kuhlmann      | Workproduct made in anticipation of<br>litigation                                               |
| 6  | LW342-43                  | email         | 6/26/19       | Tracy George   | David Strolle                                                                                 | David Strolle, Tracy George                                                       | Interoffice communication<br>regarding filing of documents              | Workproduct made in anticipation of<br>litigation                                               |
| 7  | LW344-45                  | email         | 6/28/19       | David Strolle  | Craig Crockett,<br>Larry Wright,<br>Derick<br>Rodgers,<br>Ricardo<br>Cedillo, Tracy<br>George | Craig Crockett, Larry Wright,<br>Derick Rodgers, Ricardo Cedillo,<br>Tracy George | Communication concerning<br>impending litigation                        | Workproduct made in anticipation of<br>litigation                                               |
| 8  | LW346                     | email         | 6/26/19       | David Strolle  | Craig Crockett                                                                                | David Strolle, Tracy George, Craig<br>Crockett                                    | Communication concerning<br>impending litigation                        | Workproduct made in anticipation of<br>litigation                                               |
| 9  | LW347-49                  | email         | 6/28/19       | Craig Crockett | David Strolle,<br>Larry Wright,<br>Derick<br>Rodgers,<br>Ricardo<br>Cedillo, Tracy<br>George  | David Strolle, Larry Wright, Derick<br>Rodgers, Ricardo Cedillo, Tracy<br>George  | Communication concerning<br>impending litigation                        | Workproduct made in anticipation of<br>litigation                                               |
| 10 | LW350-51                  | email         | 6/28/19       | Craig Crockett | David Strolle,<br>Larry Wright,<br>Derick<br>Rodgers,<br>Ricardo<br>Cedillo, Tracy<br>George  | David Strolle, Larry Wright, Derick<br>Rodgers, Ricardo Cedillo, Tracy<br>George  | Communication concerning<br>impending litigation                        | Workproduct made in anticipation of<br>litigation                                               |
| 11 | LW352-53                  | email         | 6/26/19       | Craig Crockett | David Strolle                                                                                 | David Strolle, Tracy George, Craig<br>Crockett                                    | Communication concerning<br>impending litigation                        | Workproduct made in anticipation of<br>litigation                                               |
| 12 | LW354                     | email         | 6/26/19       | Craig Crockett | David Strolle,<br>Larry Wright,<br>Derick<br>Rodgers,<br>Ricardo<br>Cedillo, Tracy<br>George  | David Strolle, Larry Wright, Derick<br>Rodgers, Ricardo Cedillo, Tracy<br>George  | Communication concerning<br>impending litigation                        | Workproduct made in anticipation of<br>litigation                                               |
| 13 | LW355                     | email         | 6/26/19       | Craig Crockett | David Strolle                                                                                 | David Strolle, Tracy George, Craig<br>Crockett                                    | Communication concerning<br>impending litigation                        | Workproduct made in anticipation of<br>litigation                                               |
| 14 | LW356-58                  | email         | 6/28/19       | David Strolle  | Larry Wright,<br>Derick<br>Rodgers,<br>Ricardo<br>Cedillo, Tracy<br>George                    | David Strolle, Larry Wright, Derick<br>Rodgers, Ricardo Cedillo, Tracy<br>George  | Communication concerning<br>release of lien                             | Confidential Attorney-client<br>communication/workproduct made in<br>anticipation of litigation |

|    |           |       |          |                 |                                                           |                                                                              |                                                                                           |  |
|----|-----------|-------|----------|-----------------|-----------------------------------------------------------|------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|--|
|    |           |       |          |                 | William Kuhlmann, Larry Wright, John McLeod, Adam McLeod, | William Kuhlmann, Larry Wright, John McLeod, Adam McLeod, Nathaniel Kuhlmann |                                                                                           |  |
| 15 | LW359-61  | email | 12/20/19 | David Strolle   | William Kuhlmann, Larry Wright                            | Correspondence concerning negotiations with William Kuhlmann                 | Workproduct made in anticipation of litigation                                            |  |
| 16 | LW362-63  | email | 12/19/19 | David Strolle   | William Kuhlmann, Larry Wright                            | Correspondence concerning negotiations with William Kuhlmann                 | Workproduct made in anticipation of litigation                                            |  |
| 17 | LW364     | email | 9/10/19  | David Strolle   | Larry Wright                                              | Client communication regarding proposed response to Bigfoot demand.          | Confidential Attorney-client communication/workproduct made in anticipation of litigation |  |
| 18 | LW365-66  | email | 7/30/19  | David Strolle   | Larry Wright                                              | Derick Rodgers, Sarah Van Sciver, David Strolle                              | Communication regarding follow-up to communication from Craig Crockett.                   |  |
| 19 | LW367-69  | email | 6/21/19  | Larry Wright    | David Strolle                                             | Derick Rodgers, Sarah Van Sciver, David Strolle                              | Client communication regarding Express Pipeline                                           |  |
| 20 | LW370-74  | email | 6/13/19  | Ricardo Cedillo | Derick Rodgers, Sarah Van Sciver, David Strolle           | Derick Rodgers, Sarah Van Sciver, David Strolle, Ricardo Cedillo             | Communication concerning litigation                                                       |  |
| 21 | LW375-79  | email | 6/13/19  | David Strolle   | Ricardo Cedillo, Larry Wright                             | Ricardo Cedillo, Larry Wright, David Strolle                                 | Communication concerning correspondence from Craig Crockett                               |  |
| 22 | LW380-84  | email | 6/21/19  | Larry Wright    | David Strolle, Derick Rogers, Ricardo Cedillo             | David Strolle, Derick Rogers, Ricardo Cedillo, Larry Wright                  | Communication concerning interpretation of agreement with Moore to assign interest        |  |
| 23 | LW385-89  | email | 6/21/19  | Larry Wright    | David Strolle                                             | David Strolle, Tracy George, Larry Wright                                    | Communication concerning interpretation of agreement with Moore to assign interest        |  |
| 24 | LW390     | email | 9/3/19   | David Strolle   | Larry Wright, Tracy George                                | David Strolle, Tracy George, Larry Wright                                    | Communication regarding correspondence from Bigfoot's counsel                             |  |
| 25 | LW391-93  | email | 8/20/19  | David Strolle   | Larry Wright                                              | David Strolle, Tracy George, Larry Wright                                    | Communication regarding follow-up to communication from Craig Crockett.                   |  |
| 26 | LW394-96  | email | 5/31/19  | Larry Wright    | David Strolle, John Terrill                               | David Strolle, Tracy George, Larry Wright, John Terrill                      | Communication concerning impending litigation                                             |  |
| 27 | LW397-98  | email | 5/31/19  | Larry Wright    | David Strolle, John Terrill                               | David Strolle, Tracy George, Larry Wright, John Terrill                      | Communication concerning impending litigation                                             |  |
| 28 | LW399-400 | email | 6/11/19  | Larry Wright    | David Strolle, John Terrill                               | David Strolle, Tracy George, Larry Wright, John Terrill                      | Communication concerning impending litigation                                             |  |
| 29 | LW401-08  | email | 5/6/19   | Larry Wright    | David Strolle                                             | David Strolle, Tracy George, Larry Wright                                    | Communication concerning impending litigation                                             |  |
| 30 | LW409-17  | email | 5/7/19   | Larry Wright    | David Strolle                                             | David Strolle, Tracy George, Larry Wright                                    | Communication concerning impending litigation                                             |  |
| 31 | LW418-25  | email | 4/23/19  | Larry Wright    | David Strolle                                             | David Strolle, Tracy George, Larry Wright                                    | Communication concerning interpretation of agreement with Moore to assign interest        |  |
| 32 | LW426-36  | email | 6/11/19  | David Strolle   | Tracy George                                              | David Strolle, Tracy George                                                  | Communication concerning correspondence from Andrew Seger                                 |  |
| 33 | LW436-42  | email | 6/11/19  | David Strolle   | Tracy George                                              | David Strolle, Tracy George                                                  | Communication concerning communication from Darin Borders                                 |  |
| 34 | LW443-50  | email | 6/11/19  | David Strolle   | Tracy George                                              | David Strolle, Tracy George                                                  | Communication concerning correspondence from Andrew Seger                                 |  |

|    |           |       |          |               |                             |                                                         |                                                                |                                                                                           |
|----|-----------|-------|----------|---------------|-----------------------------|---------------------------------------------------------|----------------------------------------------------------------|-------------------------------------------------------------------------------------------|
| 35 | LW451-59  | email | 6/11/19  | David Strolle | Tracy George                | David Strolle, Tracy George                             | Communication concerning correspondence from Andrew Seger      | Workproduct made in anticipation of litigation                                            |
| 36 | LW460-61  | email | 5/22/19  | Larry Wright  | David Strolle, John Terrill | David Strolle, Tracy George, Larry Wright, John Terrill | Communication concerning impending litigation                  | Confidential Attorney-client communication/workproduct made in anticipation of litigation |
| 37 | LW462-64  | email | 5/22/19  | Larry Wright  | David Strolle, John Terrill | David Strolle, Tracy George, Larry Wright, John Terrill | Communication concerning impending litigation                  | Confidential Attorney-client communication/workproduct made in anticipation of litigation |
| 38 | LW465-67  | email | 5/22/19  | Larry Wright  | David Strolle               | David Strolle, Tracy George, Larry Wright               | Communication concerning proposed edits to draft communication | Confidential Attorney-client communication/workproduct made in anticipation of litigation |
| 39 | LW468-70  | email | 5/22/19  | David Strolle | Larry Wright                | David Strolle, Tracy George, Larry Wright               | Communication concerning proposed edits to draft communication | Confidential Attorney-client communication/workproduct made in anticipation of litigation |
| 40 | LW471-72  | email | 11/13/19 | David Strolle | Larry Wright                | David Strolle, Tracy George, Larry Wright               | Communication regarding communication from David Johns         | Confidential Attorney-client communication/workproduct made in anticipation of litigation |
| 41 | LW473-74  | email | 11/13/19 | David Strolle | Larry Wright                | David Strolle, Tracy George, Larry Wright               | Communication concerning correspondence from Chris Johns       | Confidential Attorney-client communication/workproduct made in anticipation of litigation |
| 42 | LW475     | email | 6/11/19  | David Strolle | Tracy George                | David Strolle, Tracy George                             | Communication concerning correspondence from Darin Borders     | Workproduct made in anticipation of litigation                                            |
| 43 | LW476-79  | email | 12/18/19 | David Strolle | Larry Wright                | David Strolle, Tracy George, Larry Wright               | Correspondence concerning drafting of loan documents           | Confidential Attorney-client communication/workproduct made in anticipation of litigation |
| 44 | LW480-83  | email | 12/18/19 | David Strolle | Larry Wright                | David Strolle, Tracy George, Larry Wright               | Correspondence concerning drafting of loan documents           | Confidential Attorney-client communication/workproduct made in anticipation of litigation |
| 45 | LW484-86  | email | 12/20/19 | David Strolle | Larry Wright, Tracy George  | David Strolle, Tracy George, Larry Wright               | Correspondence concerning negotiations with William Kuhlmann   | Confidential Attorney-client communication/workproduct made in anticipation of litigation |
| 46 | LW487-88  | email | 12/23/19 | David Strolle | Larry Wright, Tracy George  | David Strolle, Tracy George, Larry Wright               | Correspondence concerning negotiations with William Kuhlmann   | Confidential Attorney-client communication/workproduct made in anticipation of litigation |
| 47 | LW489-91  | email | 12/19/19 | David Strolle | Larry Wright                | David Strolle, Tracy George, Larry Wright               | Communication concerning proposed edits to draft document      | Confidential Attorney-client communication/workproduct made in anticipation of litigation |
| 48 | LW492-93  | email | 2/26/19  | David Strolle | Larry Wright                | David Strolle, Tracy George, Larry Wright               | Correspondence concerning communication from Christopher Johns | Confidential Attorney-client communication/workproduct made in anticipation of litigation |
| 49 | LW494-95  | email | 2/26/19  | David Strolle | Larry Wright                | David Strolle, Tracy George, Larry Wright               | Correspondence concerning communication from Christopher Johns | Confidential Attorney-client communication/workproduct made in anticipation of litigation |
| 50 | LW496-97  | email | 2/26/19  | David Strolle | Larry Wright                | David Strolle, Tracy George, Larry Wright               | Correspondence concerning communication from Christopher Johns | Confidential Attorney-client communication/workproduct made in anticipation of litigation |
| 51 | LW498-502 | email | 6/17/19  | David Strolle | Tracy George                | David Strolle, Tracy George                             | Interoffice communication regarding impending litigation       | Workproduct made in anticipation of litigation                                            |
| 52 | LW503-05  | email | 6/11/19  | David Strolle | Tracy George                | David Strolle, Tracy George                             | Interoffice communication regarding impending litigation       | Workproduct made in anticipation of litigation                                            |
| 53 | LW506-08  | email | 3/31/19  | David Strolle | Larry Wright                | David Strolle, Tracy George, Larry Wright               | Correspondence concerning litigation                           | Confidential Attorney-client communication/workproduct made in anticipation of litigation |
| 54 | LW509-11  | email | 3/31/19  | David Strolle | Larry Wright                | David Strolle, Tracy George, Larry Wright               | Correspondence concerning litigation                           | Confidential Attorney-client communication/workproduct made in anticipation of litigation |
| 55 | LW512-14  | email | 3/31/19  | David Strolle | Larry Wright                | David Strolle, Tracy George, Larry Wright               | Correspondence concerning litigation                           | Confidential Attorney-client communication/workproduct made in anticipation of litigation |
| 56 | LW515-17  | email | 3/31/19  | David Strolle | Larry Wright                | David Strolle, Tracy George, Larry Wright               | Correspondence concerning litigation                           | Confidential Attorney-client communication/workproduct made in anticipation of litigation |
| 57 | LW518-20  | email | 6/11/19  | David Strolle | Tracy George                | David Strolle, Tracy George                             | Interoffice communication regarding impending litigation       | Confidential Attorney-client communication/workproduct made in anticipation of litigation |

|    |          |       |          |                 |                                                                              |                                                                                                           |                                                              |                                                                                           |
|----|----------|-------|----------|-----------------|------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|--------------------------------------------------------------|-------------------------------------------------------------------------------------------|
| 58 | LW521    | email | 12/26/19 | David Strolle   | William Kuhlmann, Larry Wright                                               | David Strolle, Tracy George, William Kuhlmann, Larry Wright                                               | Correspondence concerning negotiations with William Kuhlmann | Workproduct made in anticipation of litigation                                            |
| 59 | LW522    | email | 12/19/19 | David Strolle   | Larry Wright                                                                 | David Strolle, Tracy George, Larry Wright                                                                 | Communication concerning proposed edits to draft document    | Confidential Attorney-client communication/workproduct made in anticipation of litigation |
| 60 | LW523-24 | email | 10/3/19  | David Strolle   | Larry Wright                                                                 | David Strolle, Tracy George, Larry Wright                                                                 | Communication concerning impending litigation                | Confidential Attorney-client communication/workproduct made in anticipation of litigation |
| 61 | LW525-27 | email | 10/11/19 | David Strolle   | Larry Wright                                                                 | David Strolle, Tracy George, Larry Wright                                                                 | Communication concerning litigation and representation       | Confidential Attorney-client communication/workproduct made in anticipation of litigation |
| 62 | LW528    | email | 6/11/19  | David Strolle   | Ricardo Cedillo, Larry Wright                                                | David Strolle, Ricardo Cedillo, Larry Wright, Tracy George                                                | Communication concerning impending litigation                | Workproduct made in anticipation of litigation                                            |
| 63 | LW529-33 | email | 6/28/19  | Derick Rodgers  | David Strolle, Larry Wright, Ricardo Cedillo, Tracy George                   | David Strolle, Tracy George, Ricardo Cedillo, Derick Rodgers, Larry Wright                                | Communication concerning impending litigation                | Workproduct made in anticipation of litigation                                            |
| 64 | LW534-38 | email | 6/28/19  | Derick Rodgers  | David Strolle, Larry Wright, Ricardo Cedillo, Tracy George                   | David Strolle, Tracy George, Ricardo Cedillo, Derick Rodgers, Larry Wright                                | Communication concerning litigation and representation       | Confidential Attorney-client communication/workproduct made in anticipation of litigation |
| 65 | LW539-42 | email | 12/18/19 | David Strolle   | Larry Wright, Tracy George                                                   | David Strolle, Tracy George, Larry Wright                                                                 | Communication concerning proposed edits to draft document    | Confidential Attorney-client communication/workproduct made in anticipation of litigation |
| 66 | LW543-47 | email | 12/19/19 | David Strolle   | Larry Wright                                                                 | David Strolle, Tracy George, Larry Wright                                                                 | Correspondence concerning negotiations with William Kuhlmann | Confidential Attorney-client communication/workproduct made in anticipation of litigation |
| 67 | LW548-50 | email | 12/20/19 | David Strolle   | William Kuhlmann, Larry Wright, John McLeod, Adam McLeod, Nathaniel Kuhlmann | William Kuhlmann, Larry Wright, John McLeod, Adam McLeod, Nathaniel Kuhlmann, David Strolle, Tracy George | Correspondence concerning negotiations with William Kuhlmann | Workproduct made in anticipation of litigation                                            |
| 68 | LW551-55 | email | 6/18/19  | David Strolle   | Craig Crockett, Beau Phillips, Derick Rodgers, Larry Wright                  | Craig Crockett, Beau Phillips, Derick Rodgers, Larry Wright, David Strolle, Tracy George                  | Communication concerning impending litigation                | Workproduct made in anticipation of litigation                                            |
| 69 | LW556-62 | email | 6/24/19  | David Strolle   | Craig Crockett, Beau Phillips, Derick Rodgers, Larry Wright                  | Craig Crockett, Beau Phillips, Derick Rodgers, Larry Wright, David Strolle, Tracy George                  | Communication concerning impending litigation                | Workproduct made in anticipation of litigation                                            |
| 70 | LW563-64 | email | 12/19/19 | David Strolle   | William Kuhlmann, Larry Wright                                               | David Strolle, Tracy George, William Kuhlmann, Larry Wright                                               | Correspondence concerning negotiations with William Kuhlmann | Workproduct made in anticipation of litigation                                            |
| 71 | LW565-66 | email | 12/16/19 | David Strolle   | Larry Wright                                                                 | David Strolle, Tracy George, Larry Wright                                                                 | Correspondence regarding second loan modification            | Confidential Attorney-client communication/workproduct made in anticipation of litigation |
| 72 | LW567-69 | email | 12/18/19 | David Strolle   | Larry Wright                                                                 | David Strolle, Tracy George, Larry Wright                                                                 | Correspondence regarding second loan modification            | Confidential Attorney-client communication/workproduct made in anticipation of litigation |
| 73 | LW570-72 | email | 6/26/19  | Ricardo Cedillo | Derick Rodgers, David Strolle                                                | Ricardo Cedillo, Derick Rodgers, David Strolle, Tracy George                                              | Communication concerning litigation and representation       | Workproduct made in anticipation of litigation                                            |